



## Anti-Bribery and Corruption Policy

GEWS limited will not tolerate bribery or corruption in any form. Anyone found not to be following the rules set out in this Policy may result in disciplinary action being taken against them which could result in dismissal.

GEWS prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

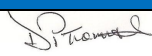
- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

**Bribery** is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company's business.

**Corruption** is the misuse of entrusted power for private gain.

**You should at all times act in accordance with the following provisions:-**

- behave honestly, be trustworthy and set a good example;
- use the resources of the Company in the best interests of the Company and do not misuse those resources;
- make a clear distinction between the interests of the Company and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Managing Director immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Managing Director;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Managing Director;
- raise any issues regarding anti-bribery and corruption laws and the Company's policies. Queries will be dealt with anonymously and a written response will be issued where appropriate;
- do not offer or accept bribes;

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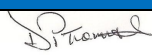
- do not, without express prior written approval from the Managing Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.
  - **Gifts** are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.
  - **Hospitality** includes invitations to hosted meals, receptions and events for business purposes.
- Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must: 1. actively resist the payment; 2. inform the Managing Director.

This policy aims to ensure that it has adequate procedures in place to prevent a breach of any relevant anti-bribery and corruption legislation.



**Dafydd Thomas**  
Managing Director

**Date: 3 January 2014**

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